

## **EXHIBIT A-9**

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1 be first.. But they bring him upstairs and -- they bring  
2 him upstairs. He gave the lawyer up there -- I forget  
3 what his name was -- gave him them papers. And I still  
4 had the one that he had to sign for Dennis Montgomery.

5 And I had four pieces of evidence I showed  
6 the president. I said it was all done with computers.  
7 I said John Ratcliffe explained what he had said on the  
8 7th.

9 And at that time, the lawyer came out,  
10 grabbed the papers, then he came out, gave them back to  
11 me, and a gal brought me back downstairs in the west  
12 wing there in the lobby and said, well, we'll call you  
13 back up.

14 Then she came back down I'll say two  
15 minutes later and said it's going to be at least two  
16 hours. We're not going to have time to see you.

17 And I said no. I said this is a matter of  
18 national security. I said I'm not leaving until he  
19 tells me I can leave and I said I'll wait the two hours.

20 So at that time I asked to use my phone  
21 outside the White House west wing.

22 And by the way, she had handed the papers  
23 back. Never read those papers.

24 And she said, yeah, you go ahead and use  
25 your phone.

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1 I went outside. There was just me and the 05:03PM  
2 guard standing out there. I was on the phone with my 05:03PM  
3 son when that picture was taken, and I watched media 05:03PM  
4 come flying over the hill like a bunch of -- a herd of 05:03PM  
5 buffalo, and that picture was taken by a guy from the 05:03PM  
6 Washington Post about a quarter mile away, and he beamed 05:03PM  
7 in on those papers from the -- from the lawyers and it 05:03PM  
8 said martial law. So that was the thing that went 05:03PM  
9 viral. 05:03PM

10 Q. Now, the papers that you were given by the 05:03PM  
11 lawyers, was one of those lawyers Sidney Powell? 05:03PM

12 A. I have no idea. 05:03PM

13 Q. Who were the lawyers that gave you those 05:03PM  
14 papers? 05:03PM

15 A. I have no idea who the lawyers were at that 05:03PM  
16 time. It was an envelope. It might have been Sidney 05:03PM  
17 Powell. I don't remember who actually gave me that 05:03PM  
18 sealed envelope. 05:03PM

19 Q. Somebody gave you -- 05:03PM

20 A. It wasn't Sidney Powell. 05:03PM

21 Q. Somebody gave you an envelope with some papers, 05:03PM  
22 but you don't -- 05:03PM

23 A. Recommendations to the President, and the guy 05:03PM  
24 gave them to me. I don't know all the lawyers that were 05:04PM  
25 behind it. I've never read those papers to this day 05:04PM

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1 because when I went back in, they took the papers after  
2 I did meet with the lawyers.

3 Q. You don't know who handed you that envelope?

4 A. Yeah, it was a guy I never met before.

5 Q. Where did he hand the papers to you at?

6 A. In DC.

7 Q. Where were you at?

8 A. It was in DC.

9 Q. Where were you at, sir?

10 A. At some hotel in DC. We were meeting before I  
11 was going to the White House.

12 Q. Was anybody with that gentleman before they  
13 handed you the papers?

14 A. What's that?

15 Q. Was anybody with the gentleman who handed you  
16 the papers that you knew?

17 A. No. No. But I knew they were coming from this  
18 team of lawyers.

19 Q. And what's the team of lawyers they were coming  
20 from?

21 THE WITNESS: The team of lawyers I think  
22 would be attorney/client privilege, wouldn't it?

23 MR. KACHOUROFF: Team of lawyers for who?  
24 I don't even know what we're talking -- who are we  
25 talking about?



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1 THE WITNESS: The papers that were handed 05:04PM  
2 to me for the White House. 05:04PM

3 MR. KACHOUROFF: I don't even know who -- 05:04PM  
4 where that came from, Mike. You can tell her if you 05:04PM  
5 know. 05:04PM

6 Q. (BY MS. WRIGLEY) Who are the lawyers, sir? 05:04PM

7 A. Huh? 05:04PM

8 Q. Who are the lawyers that you know handed you 05:04PM  
9 these papers to give to the President? 05:05PM

10 A. I don't know who the team of lawyers were. I 05:05PM  
11 have no -- I didn't -- Sidney Powell was not one of my 05:05PM  
12 lawyers. 05:05PM

13 Q. Okay. So -- 05:05PM

14 A. I didn't have any lawyers. I didn't hire 05:05PM  
15 lawyers. 05:05PM

16 Q. So somebody gave you some papers to give to the 05:05PM  
17 President? 05:05PM

18 A. It was a team, though. It had to be a trusted 05:05PM  
19 person, like a cyber guy, maybe one of Patrick Byrne's 05:05PM  
20 people. I don't know. 05:05PM

21 Q. Okay. Let me just make sure I -- 05:05PM

22 A. It was a guy I met before I -- actually, it was 05:05PM  
23 a guy that was in one of those meetings. I had seen the 05:05PM  
24 guy before. So he was trusted. I had been in meetings 05:05PM  
25 where there was like 30 people in the room. 05:05PM

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1 Q. Let me just make sure I'm clear, Mr. Lindell. 05:05PM

2 You're going to a meeting with the 05:05PM  
3 President that's a matter of national security, correct? 05:05PM

4 A. That's with my evidence and the thing to sign 05:05PM  
5 from Dennis Montgomery. 05:05PM

6 Q. And you're going to give him evidence that's 05:05PM  
7 contained in this sealed envelope, right, sir? 05:05PM

8 A. No. No. No. Now you're mixing two -- two or 05:05PM  
9 three -- 05:05PM

10 Q. I'm not mixing anything. I'm trying to -- 05:05PM

11 A. A hundred percent. 05:05PM

12 Q. -- ask questions and get information, sir. 05:05PM

13 A. There was no evidence in that envelope. That's 05:05PM  
14 not true. 05:05PM

15 Q. Okay. So -- 05:05PM

16 A. Here's what it was. I had my evidence, my four 05:05PM  
17 pieces of evidence, and I had a letter to sign that 05:05PM  
18 releases Dennis Montgomery so I can release the rest of 05:06PM  
19 it. That's what I talked to him about. All these 05:06PM  
20 people that voted that didn't -- didn't live in the 05:06PM  
21 states, I have the evidence now. It was brought to me. 05:06PM  
22 The guy's name is Dennis Montgomery. It's called Hammer 05:06PM  
23 and Scorecard. They brought up John Ratcliffe. I said 05:06PM  
24 John Ratcliffe actually said it on the 7th. 05:06PM

25 It was an afterthought. I said, and by the 05:06PM

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1 way, these are recommendations from a team of lawyers. 05:06PM  
2 And I gave him that. And he opened it up, and it was -- 05:06PM  
3 he read the first thing and the first thing only. The 05:06PM  
4 first recommendation was fire Robert O'Brien, who was 05:06PM  
5 sitting right here and -- and he was the director of 05:06PM  
6 national security. 05:06PM

7 He never read the rest of them. He folded 05:06PM  
8 it up. He said the first one says to fire you. And 05:06PM  
9 I -- and he folded it up, the President did, gave it to 05:06PM  
10 John -- Robert O'Brien and said take Mike upstairs to 05:06PM  
11 the lawyers to see if there's anything to this evidence 05:06PM  
12 and then I can -- if I could sign the Dennis Montgomery 05:06PM  
13 maybe or in this envelope -- he was mostly take the 05:06PM  
14 evidence, because that's what we had talked about for 05:06PM  
15 15 minutes. 05:07PM

16 Q. And then they turned you away, Mr. Lindell, 05:07PM  
17 correct? 05:07PM

18 A. What's that? 05:07PM

19 Q. They turned you away, the White House? 05:07PM

20 A. No. They -- finish the story. Went upstairs. 05:07PM  
21 He opened it, brought me back downstairs, said, no, you 05:07PM  
22 can't -- they won't have time to see you for two hours, 05:07PM  
23 and I said I'll wait. 05:07PM

24 That's when I went outside because I didn't 05:07PM  
25 have those papers back. I still haven't read them, 05:07PM

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1 never read them to this day. They took the picture  
2 of -- the media came over the hill. I said would y'all  
3 like me to answer questions? They go -- and I said --  
4 and they went, yeah. Yeah. Yeah.

5 And I said I changed my mind. Y'all find  
6 something really good to write about me.

7 Came back in. The lady had come down from  
8 upstairs. Not even ten minutes had passed. Brought me  
9 back upstairs to the lawyer, and that lawyer that was in  
10 there -- one of the recommendations on there was to fire  
11 him and he said this says to fire me.

12 And I said I don't care what that says. I  
13 didn't write that. That's from lawyers.

14 And I said -- and he goes, Mike, I read --  
15 my son read your book, and he got -- he all calmed down.

16 I said I haven't read that thing.

17 And he goes my son read your book.

18 I said, well, maybe you should read my  
19 book.

20 And he goes, well, Mike, this is so-and-so  
21 and so-and-so. I see you've got a matter of national  
22 security of evidence.

23 And I said, yes, we need this thing signed.  
24 This guy worked for the CIA. He has all this evidence,  
25 and he needs it signed.

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1 Q. Mr. Lindell --

05:08PM

2 A. I sat and talked to them for over an hour about  
3 these things.

05:08PM

05:08PM

4 Q. Mr. Lindell, do you remember what my question  
5 was?

05:08PM

05:08PM

6 A. You said did they turn me away. They --  
7 they -- they didn't turn me away. They went through all  
8 the evidence. I laid it out for them, and I said we  
9 need to get this signed.

05:08PM

05:08PM

05:08PM

05:08PM

10 They both got up and said, okay, we're  
11 going to look into this and we're going to get back to  
12 you.

05:08PM

05:08PM

05:08PM

13 Q. Okay.

05:08PM

14 A. They did say that.

05:08PM

15 Q. Now --

05:08PM

16 A. We'll get back to you on this.

05:08PM

17 I said this is a matter of national  
18 security. What do you mean you're going to get back to  
19 me? I said when? Tomorrow? It was like the 15th of  
20 January.

05:08PM

05:08PM

05:08PM

05:08PM

21 And then -- then they did -- brought me  
22 back downstairs, and then she came back down ten minutes  
23 later --

05:08PM

05:08PM

05:08PM

24 THE COURT REPORTER: Can you please slow  
25 down?

05:08PM

05:08PM

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1 A. She came back down ten minutes later and said 05:08PM  
2 you do have to leave. We're not going to have to time. 05:08PM

3 I said, well, he said he wanted to see me 05:08PM  
4 again. And they shooed me out without even asking him. 05:08PM

5 Q. (BY MS. WRIGLEY) In terms of these papers that 05:08PM  
6 you were given by a group of lawyers to give to the 05:08PM  
7 President -- 05:08PM

8 A. Uh-huh. 05:08PM

9 Q. -- who are the group of lawyers that gave you 05:08PM  
10 these papers, sir? 05:09PM

11 A. It was -- it was -- I don't know. I don't 05:09PM  
12 know. I do not know. 05:09PM

13 Q. And so -- 05:09PM

14 A. Probably from Patrick Byrne's group. That's as 05:09PM  
15 much as I can remember. It was an envelope. It was 05:09PM  
16 like a delivery, here, we have a recommendation. You 05:09PM  
17 have Patrick Byrnes, you have -- 05:09PM

18 Q. And you have no idea what's in this envelope 05:09PM  
19 that you're going to give to the President of the United 05:09PM  
20 States? 05:09PM

21 A. They said it was just recommendations to the 05:09PM  
22 President. I had been in meetings with all these guys, 05:09PM  
23 all these -- Patrick Byrnes and your Sidney Powells and 05:09PM  
24 all these people, and they -- if they have their 05:09PM  
25 recommendations, that's their recommendations. 05:09PM

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1 Q. Okay, sir. So let's go back to Exhibit 637,  
2 this article from the Business Insider.

3 A. I went there for one purpose, my evidence.

4 MR. KACHOUROFF: Same hearsay, relevance  
5 objections that I had before.

6 Q. (BY MS. WRIGLEY) Now, your evidence, you said  
7 you had four pieces of evidence that you gave President  
8 Trump about election fraud.

9 A. No. I showed him four -- four pieces that --  
10 it's massive. He has 32 terabytes of this. I said he  
11 worked for the government. We need this signed. If you  
12 sign this, all of this stuff can be released by the  
13 government. And before he would sign it, he brought  
14 me -- he said go upstairs to the lawyers and see what we  
15 can do.

16 Q. And that was never signed with respect to  
17 Dennis Montgomery, correct?

18 A. It wasn't signed because the lawyers shooed me  
19 out before I got to go back in and meet him.

20 Q. And the evidences that you were presenting to  
21 President Trump on January 15th was information from  
22 Dennis Montgomery?

23 A. Hundred percent.

24 Q. And that is evidence that is proof that the  
25 election was interfered with, correct?

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1 A. That's a hundred percent true.

05:10PM

2 Q. Okay.

05:10PM

3 A. And -- and by the way, Mark Meadows was in  
4 there, and Mark Meadows said -- the President said does  
5 John Ratcliffe know about this, and I said, well, I'm  
6 sure he does because -- and he goes, yeah, you know,  
7 Dennis Montgomery has brought up the Hammer and  
8 Scorecard. Mark Meadows said that.

05:10PM

05:10PM

05:10PM

05:10PM

05:10PM

05:10PM

9 And I'm sure John Ratcliffe does because he  
10 put out a statement on January 7th that China had  
11 interfered, and I'm going, wow, this is going to be  
12 great. Just sign this and we can release everything.

05:10PM

05:10PM

05:10PM

05:10PM

13 And the lawyers pushed me -- pushed me  
14 away. Never got to me. To this day, I don't know if --  
15 if they even told him that I was still in the building.

05:10PM

05:10PM

05:10PM

16 Q. Now, looking at the Business Insider article,  
17 637, I'd like to draw your attention to something on  
18 Page 2. Do you see at the bottom where it says  
19 "election officials," sir?

05:10PM

05:11PM

05:11PM

05:11PM

20 A. Yeah.

05:11PM

21 Q. It says, "Election officials and even Trump  
22 officials such as Attorney General Bill Barr and acting  
23 Secretary of Homeland Security Chad Wolf said there was  
24 no evidence of widespread fraud." Do you see that?

05:11PM

05:11PM

05:11PM

05:11PM

25 A. Yeah.

05:11PM



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1 Q. And then if you go to the next page it says,  
2 "There are no indications that a foreign actor succeeded  
3 in compromising or affecting the actual votes cast in  
4 this election, Wolf said in a November 3rd press  
5 conference."

6 Do you see that?

7 A. Uh-huh. Right.

8 Q. And then you say, "Lindell said his film would  
9 prove there was 'a communist coup.'"

10 Do you see that?

11 A. Uh-huh.

12 Q. Okay. Now, in terms of this Business Insider  
13 article, when Kim Rasmussen sent it to you, it's  
14 something you would have reviewed? Rasmussen sent it to  
15 you --

16 A. Uh-huh.

17 Q. -- you would have looked at this article, sir?

18 A. Yeah.

19 Q. This Business Insider?

20 A. Yeah.

21 Q. And you would have been aware on February 5th,  
22 2021 that at least in terms of this article, it was  
23 indicating that election officials were saying there was  
24 no evidence of widespread fraud, correct? You were  
25 aware of that?

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1 A. Was I aware of election officials saying that? 05:12PM

2 Q. Yes. 05:12PM

3 A. They were saying -- people were saying that all 05:12PM  
4 over the place. Bill Barr. You reiterated this before. 05:12PM

5 Q. Okay. 05:12PM

6 A. I had my evidence. It doesn't matter what 05:12PM  
7 other people say. Are they covering something up? I 05:12PM  
8 don't know why they were saying what they were saying. 05:12PM  
9 It didn't matter to me. 05:12PM

10 Now, if I had been someone that didn't have 05:12PM  
11 any evidence, I would say, well, why -- they told you 05:12PM  
12 there wasn't, well, I think there was. I didn't think 05:12PM  
13 there was. I knew there was because I have the 05:12PM  
14 evidence. 05:12PM

15 Q. That was evidence from Dennis Montgomery, sir? 05:12PM

16 A. Huh? 05:12PM

17 Q. Evidence from Dennis Montgomery? 05:12PM

18 A. Evidence from -- and -- and evidence that -- 05:13PM  
19 the fact evidence that all these people voted, that 05:13PM  
20 crimes were committed in every county in the United 05:13PM  
21 States, every single county because I have the voter 05:13PM  
22 rolls, and I paid a lot of money to get a lot of them. 05:13PM

23 That is a crime. Nobody has ever been able 05:13PM  
24 to say, Mike, you don't have any evidence because there 05:13PM  
25 it is. 05:13PM

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1 Q. Were you aware that Mary Fanning had written 05:13PM  
2 articles about elections prior to 2020 being interfered 05:13PM  
3 with -- 05:13PM

4 A. No idea. 05:13PM

5 Q. -- with the use of Hammer and Scorecard? 05:13PM

6 A. No idea. What I know about Mary Fanning, 05:13PM  
7 January 9th, two documentaries. 05:13PM

8 Q. Prior to working with Mary Fanning on the 05:13PM  
9 "Absolute Proof" documentary, did you do anything to 05:13PM  
10 read what she had published on her blog in the past? 05:13PM

11 A. No. 05:13PM

12 Q. And so did you think it was relevant at all to 05:13PM  
13 review the type of subject matters that Mary Fanning had 05:13PM  
14 published on her blog -- 05:13PM

15 A. Yes. 05:13PM

16 Q. -- over the years? 05:14PM

17 A. No. It's like I said before, I don't care who 05:14PM  
18 Mary Fanning is or what she is. I had hardcore evidence 05:14PM  
19 of everybody voting in every state illegally, and Mary 05:14PM  
20 Fanning had the answer, if it was true, of what this 05:14PM  
21 Dennis Montgomery had. 05:14PM

22 I didn't carry about Mary Fanning. Then 05:14PM  
23 Dennis Montgomery brings me the evidence. I don't care 05:14PM  
24 what Dennis Montgomery's past is. I want to know is 05:14PM  
25 this real, true or not, so I did my own due diligence 05:14PM

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1 and then I went all in.

05:14PM

2 Q. Now, you were getting information on the  
3 election in November and December of 2020, correct?

05:14PM

4 A. By -- from -- a lot of it from myself.  
5 90 percent of it from me.

05:14PM

05:14PM

6 Q. Okay. And you were doing research on your own,  
7 Mr. Lindell?

05:14PM

05:14PM

8 A. Every single day from morning until night until  
9 the day I went to -- to the second I went to bed.

05:14PM

05:14PM

10 Q. And -- and exactly where were you getting  
11 information on the election prior to 2021 in doing your  
12 research?

05:14PM

05:14PM

05:14PM

13 A. What do you mean prior to 2021?

05:14PM

14 Q. Yeah. Like where were you getting your  
15 information, sir?

05:14PM

05:14PM

16 A. From the counties, from the states. Like you  
17 say, the secretary of states. These voter -- I would go  
18 and get voter rolls, voter rolls and buy voter rolls and  
19 get -- you know, get the people -- the people that  
20 voted, who voted, what they -- who they voted --

05:14PM

05:14PM

05:15PM

05:15PM

05:15PM

21 Q. And then what did you do --

05:15PM

22 A. In counties -- and by the way, in the counties.  
23 I got a lot of information from CNN, by the way.  
24 Counties where you see anomalies -- I'll give you an  
25 example. Outside of Milwaukee, there's two counties. I

05:15PM

05:15PM

05:15PM

05:15PM

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1 went back in time, and traditionally, they're always 05:15PM  
2 75 percent Republican, 75 percent. One of them wasn't 05:15PM  
3 done counting on election day, and it was 25 percent 05:15PM  
4 Republican. 05:15PM

5 Now, you -- and I looked back and see, 05:15PM  
6 well, how many people moved out of there, was there a 05:15PM  
7 big change? No. So that's an anomaly. That's a 05:15PM  
8 deviation. Those are the things I looked for. 05:15PM

9 I wanted to make sense of the deviations, 05:15PM  
10 and -- and we could go over -- I could sit and hear 05:15PM  
11 hundreds of deviations. I spent every day going, gee, 05:15PM  
12 why would -- or why would Pennsylvania have more votes 05:15PM  
13 than voters? It's impossible. You have an election 05:15PM  
14 with ten people, and the vote -- final vote is ten to -- 05:15PM  
15 ten to six. That doesn't make sense. 05:15PM

16 Q. Now, in late 2020, were you working with Sidney 05:15PM  
17 Powell on the election? 05:16PM

18 A. Huh-uh. Huh-uh. 05:16PM

19 Q. In late 2020, were you working with Lyn Wood? 05:16PM

20 A. No, I wasn't working with anyone. It was 05:16PM  
21 always myself. 05:16PM

22 Q. Did you get information from Sidney Powell in 05:16PM  
23 late 2020? 05:16PM

24 A. Sidney Powell, I had one phone call with her. 05:16PM  
25 In that -- in that call, they said -- this is early in 05:16PM

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1 November, and on that call, they were trying to raise  
2 money for -- I believe it was for the Andrew County  
3 thing for ASOG. That's where I actually putting money  
4 in.

5 And I remember asking. I said can I talk  
6 to this Sidney Paul. I know I met her one other time,  
7 and I didn't know that I had met her three years prior  
8 at a book show.

9 And what I said to her on the phone, I  
10 said -- I said is there -- I said could this election --  
11 is this election -- I said what I found so far, it  
12 doesn't make sense. I said people voted that don't live  
13 in the county.

14 And she goes -- and I said is something  
15 going to happen?

16 She goes -- she goes, Mike, it's -- it's --  
17 we -- we have enough stuff, not even counting the  
18 machines but she -- and I said, well, then why do we  
19 need money for the machines?

20 She said that's got to be addressed because  
21 that's going to be a permanent thing that we have to  
22 fix.

23 You asked about Lyn Wood, Lyn Wood was the  
24 year before with the -- with the vaccine I had when  
25 Anderson Cooper attacked me. Lyn Wood -- Lyn Wood

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1 helped me out with CNN.

05:17PM

2 Q. In late 2020, did you get any information on  
3 Hammer and Scorecard?

05:17PM

05:17PM

4 A. Did I get any information? If I did, I don't  
5 remember. I didn't know what it was if I did.

05:17PM

05:17PM

6 Q. In late 2020, did you get any information from  
7 Dennis Montgomery?

05:17PM

05:17PM

8 A. No, not that I know of because I wouldn't -- I  
9 wouldn't have known anything about it.

05:17PM

05:17PM

10 (Exhibit 638 marked.)

05:17PM

11 Q. (BY MS. WRIGLEY) Okay. I'm going to hand to  
12 you Exhibit 638, sir. For the record, this is a text  
13 chain between yourself and Scott Baio. This one is  
14 Bates stamped DEF 047408. It's not the full text chain,  
15 which is very long. It's just an excerpt of it. It's  
16 Page 1 and Page 49.

05:17PM

05:17PM

05:18PM

05:18PM

05:18PM

05:18PM

17 Mr. Lindell, do you see at the top this is  
18 a text between you and Scott Baio that starts on -- the  
19 text chain that starts on May 9th, 2018? Do you see  
20 that, sir?

05:18PM

05:18PM

05:18PM

05:18PM

21 A. Uh-huh.

05:18PM

22 Q. And Mr. Baio, I think you identified him  
23 earlier, he --

05:18PM

05:18PM

24 A. Yeah.

05:18PM

25 Q. -- used to be an actor and is a friend yours?

05:18PM

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1 A. Right. Yeah.

05:18PM

2 Q. I'm going to have you skip to the second page,  
3 which in this --

05:18PM

05:18PM

4 A. Uh-huh.

05:18PM

5 Q. -- produced text says Page 49. Do you see at  
6 the top there's a date November 30th, 2020?

05:18PM

05:18PM

7 A. Uh-huh.

05:18PM

8 Q. Mr. Baio texted you, "Any more information?"  
9 Do you see that?

05:18PM

05:19PM

10 A. Uh-huh.

05:19PM

11 Q. And you wrote, "Yes. I can update you  
12 tomorrow. All great. Have faith."

05:19PM

05:19PM

13 A. Uh-huh.

05:19PM

14 Q. Do you see that, Mr. Lindell?

05:19PM

15 A. Yeah.

05:19PM

16 Q. And then you provided him some information in a  
17 big text here that says, "Here are some of the  
18 highlights from the McInerney statement that were  
19 especially important." Do you see that?

05:19PM

05:19PM

05:19PM

05:19PM

20 A. Uh-huh.

05:19PM

21 Q. Where did you get this information from?

05:19PM

22 A. It was probably off the Internet. I've  
23 never -- I have never -- I didn't know what Hammer and  
24 various cyber weapons -- I had no idea what they were,  
25 Hammer and Scorecard. I didn't know Dennis Montgomery

05:19PM

05:19PM

05:19PM

05:19PM



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1 from the man on the moon.

05:19PM

2 All this stuff here, Chris Krebs, Chris  
3 Miller, I don't know where this came from. It's  
4 probably a screenshot on -- on the website. I have no  
5 idea. I didn't know who McInerney was either until I  
6 met him at -- February 5th.

05:19PM

05:19PM

05:19PM

05:19PM

05:19PM

7 Q. Now, below this you say, "Some confidential  
8 stuff to check out, Scott, thumbs up."

05:19PM

05:19PM

9 Do you see that?

05:19PM

10 A. Uh-huh.

05:19PM

11 Q. And do you know why you would have identified  
12 this as some confidential stuff?

05:19PM

05:19PM

13 A. I have no idea.

05:19PM

14 Q. Now, this information that you gave him has a  
15 number of bullet points listed here. Do you see that,  
16 sir?

05:19PM

05:20PM

05:20PM

17 A. Yeah.

05:20PM

18 Q. It says, "Hammer and various cyber weapons were  
19 previously used by USA against other countries. Now the  
20 weapons are being deployed against us. Obama is behind  
21 everything."

05:20PM

05:20PM

05:20PM

05:20PM

22 A. Uh-huh.

05:20PM

23 Q. Do you see that bullet point?

05:20PM

24 A. Uh-huh.

05:20PM

25 Q. And looking at that bullet point, sir, do you

05:20PM

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1 think that makes sense?

05:20PM

2 A. Knowing now what I know about Hammer and  
3 Scorecard, it could be true.

05:20PM

05:20PM

4 Q. Okay. And do you think Obama is behind  
5 everything, sir?

05:20PM

05:20PM

6 A. I -- I didn't write this.

05:20PM

7 Q. Okay. You did send it to Scott Baio, though,  
8 right?

05:20PM

05:20PM

9 A. What's that?

05:20PM

10 Q. You did send it to Mr. Baio on --

05:20PM

11 A. Yeah. I don't know where it came from. This  
12 is just bullet points from -- it looks like it came from  
13 Mc -- General McInerney.

05:20PM

05:20PM

05:19PM

14 Q. Well, and you said the McInerney statement. Do  
15 you know where that statement would have come from?

05:20PM

05:20PM

16 A. I have no idea what it is.

05:20PM

17 Q. And this is -- General McInerney is one of the  
18 generals --

05:20PM

05:20PM

19 A. This was sent to me. I didn't write that. I  
20 didn't put -- I didn't type in, "Here are some of the  
21 highlights." I couldn't even make -- I couldn't even  
22 type that good with all those little bullet points.  
23 This was something that was sent to me that I forwarded  
24 to Scott.

05:20PM

05:20PM

05:20PM

05:20PM

05:20PM

05:21PM

25 Q. Now, General Mc -- McInerney is one of the

05:21PM

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1 generals that you testified earlier was the -- the --

05:21PM

2 A. Right.

05:21PM

3 Q. -- sort of a validator of --

05:21PM

4 (Crosstalk.)

5 A. First time I ever met him --

6 Q. (BY MS. WRIGLEY) Correct?

7 A. -- I thought that I ever heard his name was in

8 "Absolute Proof."

9 Q. Okay.

10 A. This here from McInerney, I had no idea he was

05:21PM

11 a general. This -- this thing was sent to me by

05:21PM

12 somebody. I have no idea who.

05:21PM

13 Q. But you consider him to be a reliable source,

05:21PM

14 correct?

05:21PM

15 A. When I had heard he was a general on "Absolute

05:21PM

16 Proof."

05:21PM

17 Q. Okay. And as you sit here today --

05:21PM

18 A. Back here, I didn't know any of these things

05:21PM

19 here.

05:21PM

20 Q. Now, if you look at the second bullet point, it

05:21PM

21 says, "Creator of Hammer and Scorecard is Dennis

05:21PM

22 Montgomery, former CIA analyst."

05:21PM

23 A. Uh-huh.

05:21PM

24 Q. Do you see that?

05:21PM

25 A. Uh-huh.

05:21PM

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1 Q. It also says, "FOX flipped against America.  
2 Deep state coup coordinators recruited the entire U.S.  
3 media and Big Tech to defeat the Republic and overthrow  
4 the U.S. Constitution." Do you see that?

5 A. Uh-huh.

6 Q. Does that make sense, sir?

7 A. What's that?

8 Q. Does that make sense that FOX --

9 (Crosstalk.)

10 A. I didn't write this. I didn't write this. I  
11 forwarded it to Scott.

12 Q. (BY MS. WRIGLEY) Okay. At the time, did you  
13 think that this made sense?

14 A. I don't know. I don't -- I -- do I think it  
15 made sense? I didn't understand half of it. I didn't  
16 know what Hammer and Scorecard was. I didn't know  
17 Dennis Montgomery. His name is spelled wrong, by the  
18 way on --

19 Q. The next bullet point --

20 A. Did I think FOX flipped against the country?  
21 Absolutely, because of a -- they did a couple of things  
22 that didn't make sense back then.

23 Q. The next bullet point says, "The December 14th  
24 deadline doesn't matter. President Trump should not  
25 leave office until all the facts surrounding the

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1 election theft are analyzed, including vote count 05:22PM  
2 distributions caused by fraudulent electronic 05:22PM  
3 manipulation of targeted voting machines." Do you see 05:22PM  
4 that? 05:22PM

5 A. Uh-huh. 05:22PM

6 Q. That's information that -- 05:22PM

7 A. What's that? 05:22PM

8 Q. -- you had seen in November of 2020? 05:22PM

9 A. Yeah. 05:22PM

10 Q. Now, the next bullet point says, "The fact that 05:22PM  
11 all five battleground states stopped counting at the 05:22PM  
12 same time 'demonstrates prior coordination by election 05:22PM  
13 officials in five battleground states.' Then they used 05:22PM  
14 Hammer and Scorecard, plus Dominion, to move Joe Biden 05:22PM  
15 into the lead. It is a mathematical impossibility the 05:23PM  
16 way the votes came in. An algorithm was used." Do you 05:23PM  
17 see that bullet point? 05:23PM

18 A. Uh-huh. 05:23PM

19 Q. Does that make sense, sir? 05:23PM

20 A. What's that? 05:23PM

21 Q. At the time you sent this to Scott Baio, did 05:23PM  
22 you think that that bullet point made sense? 05:23PM

23 A. I don't remember sending this to Scott Baio, 05:23PM  
24 and I don't remember even reading this. Obviously, I 05:23PM  
25 sent -- resent it to him. 05:23PM

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1 I didn't write this. Do I agree with all 05:23PM  
2 of it? Like the -- it was just battleground states, no. 05:23PM  
3 I knew something happened in every state. Every single 05:23PM  
4 state in every single county, not just five battleground 05:23PM  
5 states. 05:23PM

6 It looks like it's from Sidney. "The 305 05:23PM  
7 Battalion military intelligence is 'Kraken.' They 05:23PM  
8 always said she used that word Kraken. If I had to 05:23PM  
9 guess, this was something that she put out. That's what 05:23PM  
10 I'm guessing. 05:23PM

11 Q. And that -- that bullet point says, "The 30th 05:23PM  
12 [sic] Battalion military intelligence is 'Kraken," 05:23PM  
13 right? 05:23PM

14 A. I have no idea what that means, and I have no 05:23PM  
15 idea what Kraken is. I absolutely do not. I have no 05:23PM  
16 knowledge of that, but Sidney used that term, remember. 05:23PM

17 If you had to tell me, I'd say go find the 05:24PM  
18 person that wrote this, I wouldn't even know where to 05:24PM  
19 begin. I would have you start with her just by that 05:24PM  
20 word Kraken. 05:24PM

21 Q. Now, if you look down a couple of bullet 05:24PM  
22 points, do you see where it says, "Once caught, mid 05:24PM  
23 level treasonous actors will point fingers at Biden and 05:24PM  
24 Obama, saying they were ordered to carry out the 05:24PM  
25 treasonous acts"? 05:24PM

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1	Do you see that?	05:24PM
2	A. Yeah. I don't know what that means.	05:24PM
3	(Witness mumbling to himself.)	05:24PM
4	THE COURT REPORTER: I'm sorry.	05:24PM
5	A. I don't know what that one is.	05:24PM
6	Q. (BY MS. WRIGLEY) Okay. Now, this is	05:24PM
7	information that you sent to Mr. Baio in a text and --	05:24PM
8	and you identified as highlights from the McInerney	05:24PM
9	statement. Do you see that?	05:24PM
10	A. No, I didn't put that there. Someone else	05:24PM
11	wrote that. Someone text that to me. I did not type	05:24PM
12	here are some highlights from McInerney. Because I	05:24PM
13	would have said to Scott, McInerney is General	05:24PM
14	McInerney, I guess. I didn't explain to Scott anything.	05:24PM
15	I just forwarded this piece of paper.	05:24PM
16	Q. When you got information about election fraud,	05:24PM
17	whether it be in 2020 or 2021, Mr. Lindell, did you	05:24PM
18	critically look at that information to see if it	05:25PM
19	actually made sense?	05:25PM
20	A. Absolutely.	05:25PM
21	Q. And --	05:25PM
22	A. A hundred percent I did.	05:25PM
23	Q. And did you ever consider, in looking at	05:25PM
24	information that you got about election fraud from --	05:25PM
25	for the 2020 election, like whether or not it had a --	05:25PM

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1 let me just say a tinge of conspiracy theory to it? 05:25PM

2 A. No. Because I seen them with my own eyes. If 05:25PM  
3 I heard it from someone else and didn't see it with my 05:25PM  
4 own -- it all -- if I can, I'll explain this real slow 05:25PM  
5 for you. 05:25PM

6 Q. I don't know if you mean that sarcastically. 05:25PM

7 A. I've got Dennis Montgomery's evidence. Okay? 05:25PM  
8 I've got Dennis Montgomery's evidence. Then the next 05:25PM  
9 thing was Dr. Frank's evidence that validated. Then the 05:25PM  
10 next thing I got was hundreds of thousands of canvassers 05:25PM  
11 that went out like -- check like Florida. They 05:25PM  
12 canvassed 80 something thousand homes to see if 05:25PM  
13 people -- if they voted, what -- and -- and to -- you 05:25PM  
14 know what canvassing is, obviously. 05:25PM

15 Q. Yes. 05:25PM

16 A. Did that. That validated every -- that 05:25PM  
17 validated Dennis' information and Dr. Frank's. Then 05:26PM  
18 here comes along the cast vote records. All four of 05:26PM  
19 them, I say the same thing. When you have something, 05:26PM  
20 it's -- here, this is what it is. They can't show 05:26PM  
21 different numbers because they all have to be exactly 05:26PM  
22 the same. 05:26PM

23 So one thing validated the next. All 05:26PM  
24 that's happened to me in the last three years, it 05:26PM  
25 validated that we've got to get rid of these voting 05:26PM



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1 machines. It's exactly -- exactly what happened, and we 05:26PM  
2 don't have a choice. 05:26PM

3 Q. I'm going to hand you another document, sir. 05:26PM  
4 This is going to be 639. 05:26PM

5 (Exhibit 639 marked.) 05:26PM

6 A. And to answer your question, nobody could ever 05:26PM  
7 tell me different. No one. You can sort of show me 05:26PM  
8 evidence the other way. Show me the cast vote records, 05:26PM  
9 that your machines were not computer manipulated. No, 05:26PM  
10 you won't. You won't open them. 05:26PM

11 Q. (BY MS. WRIGLEY) Looking at this Exhibit 639, 05:26PM  
12 do you see that it's -- is an E-mail from Mary Fanning 05:27PM  
13 to yourself, subject, forward key points on 05:27PM  
14 January 10th, 2021, sir? 05:27PM

15 A. Okay. 05:27PM

16 Q. And then do you see that she attaches a key 05:27PM  
17 points document to her E-mail, sir? 05:27PM

18 A. Uh-huh. 05:27PM

19 Q. And just for the record, the attachment is -- 05:27PM

20 A. Uh-huh. 05:27PM

21 Q. -- DEF 030860, and it is three pages. 05:27PM

22 Did you review this key points document 05:27PM  
23 Mary Fanning sent you on January 10th, 2021? 05:27PM

24 A. I don't know. Probably. 05:27PM

25 Q. Okay. 05:27PM

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1 A. I'm sure I did because I wanted to know about 05:27PM  
2 Dennis Montgomery. 05:27PM

3 Q. And she sent you a -- a list of bullet 05:27PM  
4 points -- 05:27PM

5 A. Uh-huh. 05:27PM

6 Q. -- in this key points document, correct? 05:27PM

7 A. Correct. 05:27PM

8 Q. And the majority of these bullet points relate 05:27PM  
9 to either Dennis Montgomery or Hammer and Scorecard, 05:27PM  
10 correct? 05:27PM

11 A. That is correct. 05:27PM

12 Q. And the first one talks about Dennis Montgomery 05:27PM  
13 holding a TS/SCI security clearance, correct? 05:28PM

14 A. That's correct. 05:28PM

15 Q. Now, when you looked at these bullet points, 05:28PM  
16 did you evaluate them to see if they made sense, sir? 05:28PM

17 A. Absolutely. Right down the line. Even when 05:28PM  
18 you get down to Bill Binney, remember I mentioned him 05:28PM  
19 earlier, and Kirk Wiebe, validated. Up and down here. 05:28PM  
20 Louie Gohmert, I validated all that stuff. 05:28PM

21 The -- John -- John Brennan and John -- or 05:28PM  
22 James Clapper, all the stuff that's in here, I either 05:28PM  
23 tried the best I could to validate it, besides at the 05:28PM  
24 same time validating his data, that it was real, that 05:28PM  
25 his data came from the 2020 election. That's what I had 05:28PM

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1 Conan Haynes doing and Todd Sanders. 05:28PM

2 Q. I'm done with that, Mr. Lindell. 05:28PM

3 A couple more questions. After you put out 05:28PM  
4 your documentaries, how did -- how were the sales for 05:28PM  
5 MyPillow? 05:28PM

6 A. Terrible. They were going down. We lost 05:28PM  
7 every -- by then, we lost every -- we lost Costco right 05:28PM  
8 after that, which cost us -- Costco came after that, and 05:29PM  
9 I already -- I -- I already knew the more I talked about 05:29PM  
10 the election, the more -- the more I was going to get 05:29PM  
11 cancelled, and sure enough, Costco cancelled right after 05:29PM  
12 that movie, and that hurt us the most because Costco -- 05:29PM  
13 Costco, that was a separate business and millions of 05:29PM  
14 dollars, and it involved 90 something people that never 05:29PM  
15 went home, and they directly cancelled because of that 05:29PM  
16 movie. 05:29PM

17 (Exhibit 641 marked.) 05:29PM

18 Q. (BY MS. WRIGLEY) Sir, I'm going to ask you to 05:29PM  
19 take a look at this exhibit which I've marked as -- 05:29PM

20 MS. WRIGLEY: What did I mark it as? 05:29PM

21 MS. LOFTUS: 642. 05:29PM

22 Q. (BY MS. WRIGLEY) 642, is that what the number 05:29PM  
23 says, sir? 05:29PM

24 MS. LOFTUS: Is that right? 05:29PM

25 MR. KACHOUROFF: The last one I have is 05:29PM

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1 639.

05:29PM

2 Q. (BY MS. WRIGLEY) Mr. Lindell, what is the  
3 number at the bottom right-hand corner from the sticker?

05:29PM

05:29PM

4 A. 00 -- 641.

05:29PM

5 Q. 641, yes.

05:29PM

6 MS. WRIGLEY: Did you give Chris a copy?

05:29PM

7 MR. KACHOUROFF: Did we miss 640?

05:29PM

8 MS. WRIGLEY: I don't know.

05:30PM

9 MR. KACHOUROFF: It's okay. I mean, I just  
10 want to --

05:30PM

05:30PM

11 MS. WRIGLEY: I don't know. We'll  
12 straighten it up afterwards.

05:30PM

05:30PM

13 Q. (BY MS. WRIGLEY) I'm looking at 641. Do you  
14 see that this is a text chain between yourself and  
15 Darryl -- Darren Lindell?

05:30PM

05:30PM

05:30PM

16 A. Uh-huh.

05:30PM

17 Q. Okay. And do you see that the text chain  
18 starts on January 20th, 2021?

05:30PM

05:30PM

19 A. Uh-huh.

05:30PM

20 Q. Now, this was produced as DEF 082635. It's an  
21 excerpt of Pages --

05:30PM

05:30PM

22 A. Uh-huh.

05:30PM

23 Q. -- 1, 2, 3, 4 and 35, 36, 37 and then also 47.  
24 I just want to ask you a couple of questions about this  
25 text chain.

05:30PM

05:30PM

05:30PM

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1	A. Okay.	05:30PM
2	Q. If you go to the second page --	05:30PM
3	A. Yeah.	05:30PM
4	Q. -- do you see -- and this is from the January	05:30PM
5	20th, 2021 text. At the top, Darren Lindell says, "Yo.	05:30PM
6	I know you're super busy, but Jess and I are starting	05:31PM
7	the wedding planning process and have some deposits we	05:31PM
8	need to put down. Is it possible to get some of our	05:31PM
9	wedding budget. Thanks. Almost 10K orders already	05:31PM
10	today." Do you see that?	05:31PM
11	A. Uh-huh.	05:31PM
12	Q. You responded to him. Do you see that?	05:31PM
13	A. Where -- where are --	05:31PM
14	Q. You say, "No. I am a little short of cash,"	05:31PM
15	with an Emoji. Do you see that?	05:31PM
16	A. Yeah.	05:31PM
17	Q. And then Darren Lindell says, "LOLOL, yeah,	05:31PM
18	been a slow few days, Emoji, 38,000 orders yesterday	05:31PM
19	shattered every record."	05:31PM
20	A. Right.	05:31PM
21	Q. And this is on January 20th, '21?	05:31PM
22	A. That's correct.	05:31PM
23	Q. And that was post --	05:31PM
24	A. That was after the picture at the White House.	05:31PM
25	Q. Yes. And just for the record, who is Darren	05:31PM

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1 Lindell, sir?

05:31PM

2 A. He's my son.

05:31PM

3 Q. And did he work for MyPillow at this time?

05:31PM

4 A. He's COO.

05:31PM

5 Q. Now, you responded, "46 million. Who said  
6 being crazy in the news isn't good"?

05:31PM  
05:31PM

7 A. Right.

05:31PM

8 Q. Do you see that?

05:31PM

9 A. Uh-huh.

05:31PM

10 Q. And were you experiencing a high amount of  
11 orders at that time?

05:31PM  
05:32PM

12 A. For the direct. We have six facets to our  
13 company. That was offsetting all of our -- at that  
14 time, it didn't last long, but it offset. We had  
15 already lost by that time -- and my son was not happy --  
16 a hundred million dollars worth of box stores by the  
17 time we had that day at the White House.

05:32PM  
05:32PM  
05:32PM  
05:32PM  
05:32PM  
05:32PM

18 This was like him joking with me, okay, I  
19 guess we're making it up here. You know, you'd have to  
20 ask him, but he -- he wasn't happy with anything I was  
21 doing.

05:32PM  
05:32PM  
05:32PM  
05:32PM

22 Q. Okay. If I could have you turn to the page  
23 which has the number at the decimal point 37 on this  
24 excerpt. Are you there, sir?

05:32PM  
05:32PM  
05:32PM

25 A. Which one?

05:32PM

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1	Q. It's 37 at the bottom.	05:32PM
2	A. Uh-huh.	05:32PM
3	Q. Are you there?	05:32PM
4	A. Yep.	05:32PM
5	Q. Do you see at the second date in the middle is	05:32PM
6	June 21st, 2021? Do you see that?	05:32PM
7	A. Yeah.	05:32PM
8	Q. And Mr. -- you write, "Sounds good. Are you	05:32PM
9	out there?"	05:33PM
10	A. What how?	05:33PM
11	Q. On the right, you write --	05:33PM
12	A. Which one am I looking at? 37?	05:33PM
13	Q. 37. June 21st, 2021.	05:33PM
14	A. And where -- where am I looking at here?	05:33PM
15	Q. On the right, you say, "Sounds good. Are you	05:33PM
16	out there?"	05:33PM
17	A. "Sounds good," yes.	05:33PM
18	Q. Okay. And that's on June 21st, 2021, correct?	05:33PM
19	A. That's correct.	05:33PM
20	Q. And you had done a number of the documentaries	05:33PM
21	by then, right? You had done a number of the	05:33PM
22	documentaries by then, correct?	05:33PM
23	A. Yeah. They were -- they were done two months	05:33PM
24	prior to that. I did a -- I did an event in Wisconsin,	05:33PM
25	that's what I'm talking about here. I did an event in	05:33PM

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1 Wisconsin. It was called -- it was 18,000 people showed  
2 up. It was for our FrankSpeech for my new platform.

3 Q. And then, Mr. Lindell, your son, Darren, said,  
4 "Call me when you can. We're going to have way too much  
5 foam soon. Need to make adjustments." Do you see that?

6 A. Yeah. You're right. Because we're slowing  
7 down, he means we're going to have -- way too much foam  
8 means we're over buying. Our sales are starting to  
9 fatigue. You are correct, we have to make adjustments.  
10 You can't keep buying that much foam.

11 Q. He says, "Also we should talk Supima and Corded  
12 offers when you have the chance." Do you see that?

13 A. That's correct.

14 Q. And then you responded to him on June 27th,  
15 2021 stating, "We did 2 million today. Biggest day  
16 since February 28th. The real president gave me a shout  
17 out." Do you see that?

18 A. Yep.

19 Q. Now, I want to have you go down to the next  
20 page, Page 47.

21 A. What's that?

22 Q. The next page, I think it's 47 in your  
23 document.

24 A. Yeah.

25 Q. And do you see in the middle there's a date



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1 November 24th, 2021?

05:34PM

2 A. Yeah.

05:34PM

3 Q. And a little bit down on the right -- actually,  
4 it's the next date on the 27th of November, do you see  
5 where you wrote in the text, "5.5 million a day"?

05:34PM

05:34PM

05:34PM

6 A. Uh-huh.

05:34PM

7 Q. And would that have been --

05:34PM

8 MR. KACHOUROFF: Objection. That's not  
9 what it says.

05:34PM

05:34PM

10 Q. (BY MS. WRIGLEY) Well, let me just ask you --

05:35PM

11 MR. KACHOUROFF: The document speak for  
12 it -- yeah.

05:35PM

05:35PM

13 Q. (BY MS. WRIGLEY) If you look at November 27th,  
14 2021, what did you text on that day, sir?

05:35PM

05:35PM

15 A. It says, "Okay."

05:35PM

16 "Put him in line."

05:35PM

17 THE COURT REPORTER: I'm sorry.

05:35PM

18 THE WITNESS: I'm just trying to read it.  
19 I'm not making a statement.

05:35PM

05:35PM

20 A. "5.5 million dollar day." I don't know what  
21 that -- what that was.

05:35PM

05:35PM

22 "Sent an attachment." I don't know what  
23 the attachment is.

05:35PM

05:35PM

24 "What are you doing this morning?"

05:35PM

25 Q. (BY MS. WRIGLEY) Would that have been

05:35PM

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1 \$5.5 million of MyPillow product sales that day? 05:35PM

2 A. No. That probably -- that probably had to be 05:35PM  
3 for the whole week. 05:35PM

4 Q. And so -- 05:35PM

5 A. It could have been that day, but I don't know 05:35PM  
6 what day -- that would have been a special day. 05:35PM

7 Q. You said "day," right? 05:35PM

8 A. I -- I know I said "day." 11-27, that's our -- 05:35PM  
9 usually -- well, that's usually -- you know what, that 05:35PM  
10 is our biggest day. That was -- I know what it was. 05:35PM

11 That was Black Friday. That's why. Black Friday is 05:35PM  
12 always our biggest day of the year, or Cyber Monday. 05:35PM

13 Q. Okay. And let me just ask you this: You 05:35PM  
14 continued to sell MyPillow products in 2021, correct? 05:36PM

15 A. Uh-huh. 05:36PM

16 Q. And in 2022, did you continue tell MyPillow 05:36PM  
17 products? 05:36PM

18 A. Uh-huh. 05:36PM

19 Q. And did MyPillow turn a profit in 2021, made 05:36PM  
20 money? 05:36PM

21 A. It would -- 2020 was our biggest profit because 05:36PM  
22 of the Coronavirus. '21, it went down. '22, we lost 05:36PM  
23 money. And then '23, we lost millions. 05:36PM

24 Q. Okay. So did you make any money -- well, let 05:36PM  
25 me ask you this: Did MyPillow turn a profit in 2023? 05:36PM

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1 A. No.

05:36PM

2 Q. Okay. And in 2022, did MyPillow --

05:36PM

3 A. No.

05:36PM

4 Q. -- turn a profit?

05:36PM

5 A. No.

05:36PM

6 Q. In 2021, did MyPillow turn a profit?

05:36PM

7 A. Now, it could have been because we were at a  
8 plateau, and because of being a Republican and losing  
9 all the box stores, our business (Oral noise).

05:36PM

05:36PM

05:36PM

10 Q. Okay. Now, do you currently advertise MyPillow  
11 products in 2024?

05:36PM

05:36PM

12 A. Yeah.

05:36PM

13 Q. And where do you advertise MyPillow products?

05:36PM

14 A. The same place we always did, podcasts and the  
15 places we lost, we lost all of our -- Costco, which was  
16 all the show people. We lost the shopping channels. We  
17 lost the box stores. All we have left is our print, TV  
18 and podcasts, which has been our -- kind of our mainstay  
19 since 2010.

05:36PM

05:36PM

05:36PM

05:37PM

05:37PM

05:37PM

20 Q. Okay. And, sir, do you, on an annual basis,  
21 get dividends or money as an owner of MyPillow?

05:37PM

05:37PM

22 A. No. Everybody gets -- if you have -- if you  
23 have a stock dividend, it's -- if you -- once -- we're  
24 an S corp -- or an LLC. So it's in our bylaws, you have  
25 to pay out to the people because it's a pass through

05:37PM

05:37PM

05:37PM

05:37PM

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1 income, so you have to pay out the highest  
2 stockholders -- enough to cover his taxes.

3 So normally, we always got -- every --  
4 everybody in the company got stock -- stock div -- not  
5 dividends. I guess disbursements. You would have to  
6 disburse so they could -- they have to pay taxes on that  
7 if the company made money.

8 Now, that stopped because of my election  
9 stuff. Every -- we've lost money every year since. No  
10 one has got a stock dividend since 2021, I believe,  
11 early '21.

12 Q. Did you get a dividend for the year 2000, you  
13 personally from MyPillow?

14 A. For what?

15 Q. Did you personally get a dividend from MyPillow  
16 in the year 2000?

17 A. 2000?

18 Q. Or from the sales themselves?

19 A. 2020 you mean?

20 Q. Yeah, 2020. Thank you.

21 A. Yeah. No, everybody did in the company. I  
22 get -- I don't get to take one. Everybody gets one.  
23 Everybody gets -- it's all equal. I don't get -- I  
24 don't get a bonus.

25 Q. Okay. Let me ask you this: You get a salary

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1 from MyPillow every year, correct?

05:38PM

2 A. Uh-huh.

05:38PM

3 Q. And some years, you would get an amount of  
4 money based on the profits of MyPillow as a -- as an  
5 owner or a shareholder of that company, correct?

05:38PM

05:38PM

05:38PM

6 A. It's -- yes. Because if you don't, if you just  
7 keep the money in your bank, you still have to pay tax  
8 on that money.

05:38PM

05:38PM

05:38PM

9 Q. Okay. And did you receive over \$20 million in  
10 the year 2020 from your shares or any dividend from  
11 MyPillow?

05:38PM

05:38PM

05:38PM

12 A. I don't know how much I made in 2020.

05:38PM

13 Q. Okay. Would you report that on your tax  
14 returns?

05:38PM

05:38PM

15 A. Of course. It has to be. It's a pass through.  
16 You can't -- it's not a passive income. It -- it is  
17 real income. You have to report it.

05:38PM

05:39PM

05:39PM

18 Q. Okay. And --

05:39PM

19 A. Even if you don't get the cash, you have to  
20 report it.

05:39PM

05:39PM

21 Q. And you personally file tax returns every year  
22 with the IRS, correct, sir?

05:39PM

05:39PM

23 A. Yeah.

05:39PM

24 Q. Okay.

05:39PM

25 A. I'm under the biggest audit in history right

05:39PM

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1 now, and that's why they put that \$6 million thing  
2 against my one piece of property I've got.

3 Q. Now, let me ask you -- let me ask you this: In  
4 this case and some of the other cases where you're a  
5 defendant, you had previous representation that withdrew  
6 from those cases, correct?

7 A. That did what?

8 Q. That withdrew from those cases?

9 MR. KACHOUROFF: She's talking about --  
10 she's talking about --

11 A. Oh, the lawyers?

12 Q. (BY MS. WRIGLEY) Yes.

13 A. Yeah. The first lawyers, towards the spring  
14 of -- the fall of '21, I believe, and they -- we had two  
15 things. One -- MyPillow had one and they -- and I had  
16 one.

17 These guys were blatantly overcharging.  
18 They were watching my shows and watching my shows. It  
19 was crazy. I don't even know where these firms came  
20 from. We got rid of them and consolidated to one firm,  
21 and that was the Andrew Parker firm.

22 And they started -- they got up charging  
23 about a million to \$2 million a month, and last August,  
24 I said you guys, I can't afford to keep going with you.  
25 I'm out of money. I've spent every dime I have. I've

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1 sold my properties. I have nothing left. 05:40PM

2 And they said, you know, well, we can't 05:40PM  
3 work for free. 05:40PM

4 And I said, well, I'm going to have to move 05:40PM  
5 on. That's when I hired Chris. And those guys said 05:40PM  
6 we're owed one month -- 05:40PM

7 Q. Okay. 05:40PM

8 A. -- which was \$2 million. 05:40PM

9 Q. And, Mr. Lindell, do you have any plans to 05:40PM  
10 personally file for bankruptcy? 05:40PM

11 A. No. I'm trying to avoid that. 05:40PM

12 Q. Okay. And do you have assets, sir? 05:40PM

13 A. What? 05:40PM

14 Q. You have assets? 05:40PM

15 A. No, I have no assets. 05:40PM

16 Q. You don't? 05:40PM

17 A. There's nothing left. They have a \$6.6 05:40PM  
18 million -- on my house that's worth 2 million, they have 05:40PM  
19 a lien on that for 5.7 million. That's their auditor I 05:40PM  
20 told you about. That's their lien. They're arguing 05:40PM  
21 about a deduction. They said, well, you can use the 05:40PM  
22 deduction in '23. I have a loss of millions of dollars 05:40PM  
23 in '23. 05:41PM

24 Q. Okay. Let me -- 05:41PM

25 A. So there's no -- there's no assets left. 05:41PM

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1 Q. You have no assets personally, Mike Lindell,  
2 you have no assets?

3 A. Huh-uh. Huh-uh.

4 Q. Okay.

5 A. Nothing.

6 Q. And do you currently make a salary from  
7 MyPillow?

8 A. Uh-huh, and that's being garnished.

9 Q. Okay.

10 A. It's being garnished. I get I think 50 percent  
11 of that because it's being garnished by the government  
12 there, too.

13 Q. Okay. Do you own any other companies besides  
14 MyPillow, sir?

15 A. I have stock in FrankSpeech.

16 Q. Okay. Any other companies?

17 A. What?

18 Q. Any other companies that you have ownership  
19 interest in?

20 A. Just FrankSpeech, MyStore and MyPillow.

21 Q. Okay. So you have an ownership interest in  
22 three companies, MyPillow, FrankSpeech and MyStore?

23 A. Uh-huh.

24 Q. Okay. And that -- those are the only companies  
25 that you --



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1 A. That's correct.

05:41PM

2 Q. -- have an ownership on?

05:41PM

3 And, you know, no personal property such as  
4 houses?

05:41PM

05:41PM

5 A. I have a property that's got -- like I said,  
6 the IRS has a lien on it. They sold the building, I  
7 guess. No, that one is gone. I sold it and I  
8 liquidated that and had to use that cash to pay  
9 attorneys or something. There's a house my sister lives  
10 in, but she's -- I just hold the mortgage on it.

05:41PM

05:41PM

05:41PM

05:41PM

05:41PM

05:42PM

11 Q. Any other properties that you own?

05:42PM

12 A. No.

05:42PM

13 Q. Okay. Do you own any warehouse buildings?

05:42PM

14 A. No. Sold it.

05:42PM

15 Q. Okay. Does MyPillow have any cash on hand?

05:42PM

16 A. No. They're in the -- they're in the whole  
17 every day.

05:42PM

05:42PM

18 Q. Okay. Do you have any plans to file -- for  
19 MyPillow to file for bankruptcy, sir?

05:42PM

05:42PM

20 A. No. I -- no. We are -- we are going to get  
21 through this, and my employees are -- I've kept them  
22 employed. I've borrowed money. I've borrowed millions  
23 of dollars myself to keep them employed and to keep  
24 going.

05:42PM

05:42PM

05:42PM

05:42PM

05:42PM

25 Q. And --

05:42PM

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1	A. From -- and when I say "borrowed," borrowed	05:42PM
2	from your merchant server at a very high interest rate,	05:42PM
3	35 percent interest.	05:42PM
4	Q. Are you -- how many employees does MyPillow	05:42PM
5	have right now?	05:42PM
6	A. I have no idea.	05:42PM
7	Q. Okay.	05:42PM
8	A. Hundreds.	05:42PM
9	Q. Are you paying those employees' salaries?	05:42PM
10	A. Salaries?	05:42PM
11	Q. Yes.	05:42PM
12	A. You mean like wages?	05:42PM
13	Q. Yes.	05:42PM
14	A. Yeah.	05:42PM
15	Q. Okay.	05:42PM
16	A. They don't work for free.	05:42PM
17	Q. You've purchased product in order to make the	05:42PM
18	items that you sell to the public, correct?	05:42PM
19	A. Uh-huh.	05:42PM
20	Q. And do you have inventory at MyPillow?	05:42PM
21	A. Yeah.	05:43PM
22	Q. Okay. And how much inventory do you have on	05:43PM
23	hand?	05:43PM
24	A. I -- I don't know. We probably owe more than	05:43PM
25	what we have in inventory. What happened was last	05:43PM

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1 August when I announced the plan to secure our

05:43PM

2 elections, they did a \$22 million credit squish on

05:43PM

3 MyPillow. So it was like a run on a bank.

05:43PM

4           Everybody that we used to have 90-day

05:43PM

5 credit, now it's 20 days. If you don't do it, we're

05:43PM

6 not -- we're not bringing you product. So we became our

05:43PM

7 own bank. Nobody will borrow me money because of all

05:43PM

8 your lawsuits. Any other time, I could borrow millions

05:43PM

9 of dollars. No one will touch me to borrow.

05:43PM

10       Q. Now, when you say "lawsuits," Smartmatic just

05:43PM

11 has this one lawsuit against you, correct?

05:43PM

12       A. Yeah. Yeah. Well, Dominion and -- well, it's

05:43PM

13 two. When -- when they sued MyPillow, I mean, the

05:43PM

14 people -- you can't -- MyPillow can't go borrow money to

05:43PM

15 help itself because they're going, oh, you did -- you

05:43PM

16 know, you're -- you're borrowing money -- banks aren't

05:43PM

17 going to borrow that money. In fact, we got de-banked,

05:43PM

18 de-merchant server. American Express, I've never been

05:43PM

19 late a day in our lives. It's decimated.

05:43PM

20           They've attacked MyPillow, which did

05:43PM

21 absolutely nothing. These -- these poor employees. So

05:44PM

22 I'm do everything I can to keep their jobs.

05:44PM

23           And so I have no plans on declaring

05:44PM

24 bankruptcy. I'll just -- I'll keep doing whatever I can

05:44PM

25 and working day by day to get by, and we -- we -- we've

05:44PM

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1 borrowed money to pay Paul between the vendors. A lot  
2 of the vendors have said, you know -- they've said,  
3 okay, if you can pay us here, and then you borrow money  
4 here. So it's just been day by day.

5 Q. And are you still paying individuals like  
6 General Flynn or Dennis Montgomery or these private  
7 investigators --

8 A. No. No. This is -- if you watch my --

9 Q. -- to pursue your election fraud, sir?

10 A. If you watch my show -- and General Flynn was  
11 three years ago. I don't pay General Flynn. They --  
12 this -- over here -- you have the lawsuits over here.  
13 Then you have this over here, which I put probably  
14 \$30 million into. This is where I spent all my money.

15 Anybody that needed help to secure our  
16 elections, anything to -- lawsuits out there to change  
17 laws to get things back the way they were, that's where  
18 I spent all the money. That's where I ran out of money.  
19 I couldn't pay Dennis Montgomery any more. I couldn't  
20 pay all these cyber guys any more.

21 But I've got enough stuff. I've got enough  
22 evidence if I ever need the evidence. I had a plan to  
23 secure our elections, to get rid of -- and that's what  
24 we're doing now. Just today we got Robin Vos recalled.  
25 We have three more counties in South Dakota that are

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1 going machine-free, but they're all working -- they're  
2 all working for nothing. They're -- they're all  
3 volunteers. Cause America, they're vol -- some of  
4 them -- some of them are still under -- on payroll,  
5 but -- but not too many.

05:45PM

05:45PM

05:45PM

05:45PM

05:45PM

6 Q. Mr. Lindell, you're the best spokesperson for  
7 your company, MyPillow, correct?

05:45PM

05:45PM

8 A. Uh-huh.

05:45PM

9 Q. And how much time do you spend in terms of  
10 promoting and trying to sell the business of MyPillow  
11 versus the time and energy that you're putting in on  
12 these election fraud claims, sir?

05:45PM

05:45PM

05:45PM

05:45PM

13 A. From January 9th of '21 -- or let's see --  
14 November of '21 until last August, it was 18 hours a day  
15 trying to get rid of the machines and go to paper  
16 ballots.

05:45PM

05:45PM

05:45PM

05:45PM

17 Now, since August until now, since the  
18 attack on MyPillow since I announced the plan, it's  
19 18 hours a day on MyPillow. 18 hours a day. Every day  
20 I wake up, I have to worry that my employees will have a  
21 job.

05:45PM

05:45PM

05:46PM

05:46PM

05:46PM

22 Q. But prior to that, you chose to spend the time  
23 on the election fraud as opposed to your business,  
24 correct, sir?

05:46PM

05:46PM

05:46PM

25 A. Yes. Absolutely.

05:46PM

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1 Q. And that was a choice that you end up making,  
2 right?

3 A. A hundred percent. And I -- and I burned  
4 through money because I didn't care -- I don't have a  
5 company -- if we don't save our country, we don't  
6 have -- I don't have a company anyway.

7 Q. You chose to sue Smartmatic first, correct?

8 A. What's that?

9 Q. You chose to sue Smartmatic first, right, sir?

10 A. Yeah, my lawyers did. Talk to them. It was  
11 their decision.

12 Q. But you had to give the sign-off, right?

13 A. What?

14 Q. You had to give the sign-off?

15 A. Yeah. Yeah. Smartmatic sued Fox News on  
16 Jan -- February 4th, 2021. It changed -- it changed  
17 everything. Those -- you know, yes.

18 Q. And do you still advertise on Fox News, sir?

19 A. Uh-huh.

20 Q. And you pay Fox News probably 20 plus million  
21 dollars to advertise every year, correct?

22 A. It's a burden. Now we're paying them --  
23 it's -- it's down. The commercials that are working,  
24 \$400,000 a week.

25 Q. And that's what you pay Fox News to advertise

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1 MyPillow products, correct?

05:47PM

2 A. Right.

05:47PM

3 Q. And so you can still advertise MyPillow on Fox  
4 News, correct?

05:47PM

05:47PM

5 A. Yeah. What does that have to do with anything?

05:47PM

6 Q. And you can still advertise on other media  
7 stations, correct?

05:47PM

05:47PM

8 A. You can still advertise there, yes, but I can't

05:47PM

9 go on there to talk about anything or to promote my

05:47PM

10 company. I can advertise there, but you realize if the

05:47PM

11 ad doesn't break even, we get to a point where right now

05:47PM

12 this ad is fatiguing, when that -- when that dries up,

05:47PM

13 if you don't have another product right behind that --

05:47PM

14 that's where I'm at today. That ad is fatiguing. If I

05:47PM

15 don't come up with something, we're done. We don't have

05:47PM

16 a -- you know, you have to keep coming up with something

05:47PM

17 because we lost all our other outlets.

05:47PM

18 We had box stores. We have the biggest

05:47PM

19 brand this country has ever seen. All the box stores,

05:47PM

20 they're gone. They're not coming back.

05:47PM

21 Do you know just an advertiser -- let me

05:47PM

22 tell you how far this goes. An advertiser on

05:47PM

23 FrankSpeech, we went to get this company. This just

05:47PM

24 happened this week. They were going to come -- probably

05:47PM

25 come and advertise lots of stuff --

05:47PM

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1 THE COURT REPORTER: I'm sorry. Can you 05:47PM  
2 please slow down? 05:47PM

3 A. -- not just having MyPillow. And here they -- 05:47PM  
4 Chuck Norris, I'll just say it, he turns this thing 05:48PM  
5 down, advertising, because it was Mike Lindell, you 05:48PM  
6 know. No, I don't want to do it. It's Mike Lindell, 05:48PM  
7 you know. 05:48PM

8 So they -- it's, you know -- they -- 05:48PM  
9 they're not doing it because they're worried if they put 05:48PM  
10 anything in, is he going to be here tomorrow because 05:48PM  
11 he's -- he's out of money, he's been sued, he's going 05:48PM  
12 down. So nobody wants to borrow or have anything to do 05:48PM  
13 with that, so, you -- you know, we live -- we live on 05:48PM  
14 prayer. 05:48PM

15 Q. (BY MS. WRIGLEY) And, Mr. -- Mr. Lindell, many 05:48PM  
16 of those big box stores decided not to sell MyPillow 05:48PM  
17 products before Smartmatic sued anybody, correct? 05:48PM

18 A. Those box stores -- those box stores all 05:48PM  
19 decided about the same -- the biggest one was right 05:48PM  
20 after you guys, and that was Costco. Yeah. 05:48PM

21 Q. And are you aware of any statements that 05:48PM  
22 Smartmatic has ever made publicly telling anybody not to 05:48PM  
23 buy MyPillow products? 05:48PM

24 A. That's not what you're -- that's not what I'm 05:48PM  
25 upset with you guys about. 05:48PM



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1 Q. You're --

05:48PM

2 A. What does that have to do with anything?

05:48PM

3 Q. You're upset that Smartmatic filed a lawsuit --

05:48PM

4 A. When Smart -- when Smartmatic --

05:48PM

5 THE COURT REPORTER: I'm sorry. I can only  
6 take one at a time.

05:48PM

05:48PM

7 Q. (BY MS. WRIGLEY) Are you upset because

05:48PM

8 Smartmatic filed lawsuits against news organizations to  
9 protect its reputation, sir?

05:49PM

05:49PM

10 A. No.

05:49PM

11 Q. That's what you're mad about?

05:49PM

12 A. I just didn't like -- I don't like the  
13 manifestation of lawfare, of what it's done to this  
14 country, you know.

05:49PM

05:49PM

05:49PM

15 And we -- and instead of you guys opening  
16 up machines and saying we have nothing to hide -- you're  
17 not a privately held company. You work for the  
18 government. You work for us. You did not open them up.  
19 I'm very upset with all the machine companies. Open it  
20 up and say we have nothing to hide. There's nothing  
21 proprietary in there. It's a computer. Open it up and  
22 show us.

05:49PM

05:49PM

05:49PM

05:49PM

05:49PM

05:49PM

05:49PM

05:49PM

23 If you have a bank error -- a bank  
24 statement that's in error, if I have computer problems  
25 at MyPillow, you bring an IT guy in, you look and see

05:49PM

05:49PM

05:49PM

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1 what the problem is.

05:49PM

2                   You know, all those -- 242 machines went  
3 down in 2022 in Arizona at the same time. Do you know  
4 the impossibility of that? It's impossible, if they're  
5 not connected on the Internet, for every one of them to  
6 have the exact same glitch at the same moment in time.  
7 Wrong. It's impossible.

05:49PM

05:49PM

05:49PM

05:49PM

05:49PM

05:50PM

8                   I have computers, hundreds of computers at  
9 MyPillow. These are things that are impossible unless  
10 someone is controlling it.

05:50PM

05:50PM

05:50PM

11                   I will tell you this, in -- in that -- I  
12 told you about that gal in Georgia that --

05:50PM

05:50PM

13                   THE COURT REPORTER: Can you please slow  
14 down?

05:50PM

05:50PM

15                   A. -- the gal in Georgia that got zero votes in  
16 her own precinct, Brad Raffensperger called that -- it  
17 was -- it was a programming error.

05:50PM

05:50PM

05:50PM

18                   Three counties over, another Democrat, nice  
19 gal, she got 4600 votes, but she wasn't on the ballot.  
20 She wasn't on the ballot. She went -- she had said she  
21 was running two months prior. All -- all the votes from  
22 her were taken from this other candidate so this poor  
23 candidate would win. They gave them back. And Brad  
24 Raffensperger, we went after his office, and he said it  
25 was a it was programming error.

05:50PM

05:50PM

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05:50PM

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1                   Why are you programming our elections? And 05:50PM  
2 who wrote her name down to take those? She wasn't a 05:50PM  
3 write in. This is -- it's bizarre, these deviations 05:50PM  
4 across our country, but nobody will talk about them. 05:50PM  
5                   You know, if you guys had nothing to hide, 05:50PM  
6 you would open up our machines and say, hey, quit saying 05:50PM  
7 this because we are -- we are right. 05:50PM  
8                   No one's proved me wrong. Show me why all 05:50PM  
9 these people voted and committed crimes. Millions of 05:51PM  
10 people in all 50 states. If you can show me that, we 05:51PM  
11 don't -- and I would back off. No one could ever show 05:51PM  
12 me my evidence is wrong. 05:51PM  
13                   It came out of your machines. It came 05:51PM  
14 right out of them. Here's people that voted that don't 05:51PM  
15 live in this county, my own county, my own city, my own 05:51PM  
16 state and my own country. Where did these names come 05:51PM  
17 from? Explain how all these people voted that were -- 05:51PM  
18 that have deceased. Yeah, I can, because it was done 05:51PM  
19 with computers. 05:51PM  
20               Q. (BY MS. WRIGLEY) And, Mr. Lindell, do you want 05:51PM  
21 to put the voting machines out of business? 05:51PM  
22               A. I want to get rid of them as fast -- every 05:51PM  
23 single one of them in the world. You can't use -- you 05:51PM  
24 can't use computers in elections. It's too -- some 05:51PM  
25 things you have to do by hand. 05:51PM

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1 If there -- I've said this before. If  
2 you -- if there's a computer error or -- or a breach of  
3 security or a cyber attack on the United States and you  
4 go in and you hack credit cards and you hack in like the  
5 breach that time, it just comes down -- it's just a  
6 money loss, and insurance might cover stuff or you lose  
7 money like MyPillow did that time.

05:51PM  
05:51PM  
05:51PM  
05:51PM  
05:51PM  
05:51PM  
05:51PM

8 But when you have it in an election -- if  
9 you have an election -- let's just say that there's --  
10 that it's just hacked or there's just a programming  
11 error, you risk your whole country because there's --  
12 nobody gets to look in there and validate you guys. No  
13 one gets to talk to Brazil. No one got to look inside  
14 there and say, hey, what -- you know, what -- what  
15 really happened here? This guy fresh out of prison won  
16 this election.

05:52PM  
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05:52PM

17 Do you know how many countries outlawed the  
18 machines. You know, outlawed. They're outlawed in  
19 Germany, France, UK. I met with them all to come up  
20 with the best hand counting system in the world.  
21 Argentina said, hey, we can't have this any more.

05:52PM  
05:52PM  
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05:52PM  
05:52PM

22 They've out -- they've outlawed early  
23 voting all over the world, but the number one thing is  
24 we can't do computers. We have to just do it by hand,  
25 just like MyPillow, most of it is made by hand. Some

05:52PM  
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05:52PM

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1 things you can't do with machines or computers. 05:52PM

2 MS. WRIGLEY: Move to -- 05:52PM

3 A. And certainly not something -- we've got to 05:52PM  
4 bring trust back, and to bring back that trust, we need 05:52PM  
5 paper ballots hand counted. 05:52PM

6 MS. WRIGLEY: Move to strike as 05:52PM  
7 nonresponsive. 05:52PM

8 Q. (BY MS. WRIGLEY) Mr. Lindell, are you looking 05:52PM  
9 to put Smartmatic out of business? 05:53PM

10 A. Am I looking to put them out of business? 05:53PM

11 Q. Yes. 05:53PM

12 A. That's not my goal. My goal is -- I don't care 05:53PM  
13 what you guys do. I don't even care what your other 05:53PM  
14 businesses are. I'm telling you no machine company 05:53PM  
15 should be used. And just like I agree with the 05:53PM  
16 Democrats, Amy Klobuchar and Kamala Harris and everybody 05:53PM  
17 on Kill Chain and the Democrats, all the Democrat 05:53PM  
18 politicians, they want these machines gone in our 05:53PM  
19 elections. Gone. 05:53PM

20 So whatever you do -- Smartmatic does with 05:53PM  
21 their other businesses, which I've read -- I'm been 05:53PM  
22 hearing about a lot of -- 05:53PM

23 THE COURT REPORTER: I'm sorry. Can you 05:53PM  
24 please slow down? 05:53PM

25 A. -- hearing about a lot of corruption coming out 05:53PM

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1 of Florida and stuff that you guys did, the Philippines  
2 and all these other countries, but we'll see what  
3 happens there, you know. I just don't think you should  
4 have any kind of election ever done with a computer.

5 MS. WRIGLEY: I'm going to move to strike  
6 as nonresponsive.

7 Q. (BY MS. WRIGLEY) And let me ask it again.

8 Do you want to put Smartmatic out of  
9 business, sir?

10 A. Do I want to put Smartmatic out of business?

11 MR. KACHOUROFF: Objection, asked and  
12 answered.

13 A. I just -- I gave you my answer.

14 Q. (BY MS. WRIGLEY) Is the answer yes?

15 A. I don't -- Smartmatic can do anything but be  
16 involved in elections.

17 Q. Okay.

18 A. Be involved in anything. Go -- go make --  
19 well, you don't -- use your computers to make blenders.  
20 I don't know. Do whatever you want to do, but don't use  
21 them in elections.

22 Q. And, sir, you don't care about putting  
23 employees that work at Smartmatic out of jobs, do you?

24 A. You know, I feel bad for them that they're  
25 working for a company that has these devices that are

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1 used to corrupt -- corrupt these -- the elections.

05:54PM

2 Q. And you don't care about smearing Smartmatic's  
3 name either, correct?

05:54PM

05:54PM

4 A. What's that?

05:54PM

5 Q. You do not care about smearing Smartmatic's  
6 name, correct?

05:54PM

05:54PM

7 A. I'm telling you -- you can say your name or  
8 whatever. You didn't care when Kamala Harris and Amy  
9 Klobuchar said in Kill Chain you guys control the  
10 elections.

05:54PM

05:54PM

11 What I'm upset with you is why won't you  
12 show us? Instead of suing people, open up your machines  
13 and show me why I'm wrong. Show me why I'm wrong. I've  
14 got it up on my website. I've got the cast vote records  
15 from LA County. I've got evidence that you guys did  
16 what you did, but you don't -- you won't show it. Put  
17 it on the news. Put it to the jury, you know.

05:54PM

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18 Q. What's your -- what's your evidence from LA  
19 County, sir?

05:54PM

05:54PM

20 A. From your county, we have not only the cast  
21 vote records -- I have Dennis Montgomery's, but we have  
22 the cast vote records. The cast votes record match  
23 exactly Mesa County. It's hundred percent computer  
24 manipulated in the 2020 election. 100 percent. Not  
25 98 percent.

05:54PM

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1 Anybody that looks at -- that's why anybody  
2 that sees this, anybody that's -- has any knowledge of  
3 cyber or computers looks at this and go, wow, it's  
4 identical. One is Dominion, one is Smartmatic. I don't  
5 know.

6 Q. And you think that that -- the evidence that  
7 you're referring to makes sense, sir?

8 A. Makes what?

9 Q. Makes sense?

10 A. Absolutely. All -- that's the only way you can  
11 explain every county and -- and in LA County, tens of --  
12 ten -- it's over 10,000 people voted that don't live in  
13 the county. You can't explain that. Can you explain  
14 that? Explain that to me. Do you think people went,  
15 hey, let's go vote in LA County and we don't live there.  
16 They voted in other places or their names were just  
17 pulled from the voter rolls.

18 Q. You're -- you're identifying or picking on LA  
19 County because --

20 A. No, I'm not. I'm just giving --

21 THE COURT REPORTER: I can only take one at  
22 a time.

23 THE WITNESS: Yeah.

24 Q. (BY MS. WRIGLEY) You're identifying and  
25 picking on LA County because you're trying to attack and



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1 target Smartmatic, correct?

05:55PM

2 A. No. Only because that's your only county, so  
3 I've got to tell you that you're as guilty as the other  
4 machines. Every county -- every county in the country,  
5 3,143, it happened in every county.

05:55PM

05:55PM

05:55PM

05:56PM

6 This is -- when we go to these officials in  
7 the county, if I came to your county official and say,  
8 hey, do you really want to keep the machines? Look at  
9 all the people that voted in this county that don't live  
10 here.

05:56PM

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05:56PM

11 You know what we did to validate that? We  
12 canvassed. We went door to door and found these names.  
13 And like nine people that voted in LA County -- I'll  
14 give an example. Down on -- whatever, pick a street.  
15 In LA County, nine people live at this house. You get  
16 there, and one person lives there, and eight of them  
17 don't live there. And you -- and you could dig deeper.  
18 Three of them are deceased and five of them live in  
19 another part of California.

05:56PM

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20 Q. Okay, sir. Thank you. Thank you for your time  
21 today.

05:56PM

05:56PM

22 A. All right. Thank you.

05:56PM

23 Q. I appreciate it, Mr. Lindell.

05:56PM

24 A. Thanks. We got through it.

05:56PM

25 MS. WRIGLEY: All right. Let's go off the

05:56PM

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1 record.

05:56PM

2 THE WITNESS: I'm sure you guys will find  
3 other jobs when this is all over.

05:56PM

4 THE VIDEOGRAPHER: Going off the record at  
5 5:56.

05:56PM

05:56PM

6 (Whereupon, at 5:56 p.m.  
7 the deposition was concluded.)

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1 CHANGES AND SIGNATURE

2 WITNESS NAME: MICHAEL JAMES LINDELL

3 DATE OF DEPOSITION: 6-11-2024

4	PAGE	LINE	CHANGE	REASON
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I, MICHAEL JAMES LINDELL, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

\_\_\_\_\_  
MICHAEL JAMES LINDELL

THE STATE OF \_\_\_\_\_)

COUNTY OF \_\_\_\_\_)

Before me, \_\_\_\_\_, on this day personally appeared MICHAEL JAMES LINDELL, known to me (or proved to me under oath or through \_\_\_\_\_) (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office, this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC IN AND FOR  
THE STATE OF \_\_\_\_\_

My commission expires: \_\_\_\_\_

\_\_\_\_ No Changes Made \_\_\_\_\_ Amendment Sheet(s)

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

SMARTMATIC USA CORP.,	*	
SMARTMATIC	*	
INTERNATIONAL HOLDING	*	
B.V., AND SGO	*	
CORPORATION LIMITED	*	
	*	
VS.	*	CASE NO. 22-cv-0098-WMW-JFD
	*	
MICHAEL J. LINDELL	*	
AND MY PILLOW, INC.	*	

REPORTER'S CERTIFICATION OF THE ORAL  
DEPOSITION OF MICHAEL JAMES LINDELL  
6-11-2024

I, Edith A. Boggs, a Certified Shorthand  
Reporter in and for the State of Texas, hereby certify  
to the following:

That the witness, MICHAEL JAMES LINDELL, was  
duly sworn by the officer and that the transcript of the  
oral deposition is a true record of the testimony given  
by the witness;

That the original deposition was delivered to  
Nicole Wrigley, Esq.;

That a copy of this certificate was served on  
all parties and/or the witness shown herein on  
\_\_\_\_\_.

I further certify that pursuant to FRCP Rule  
30(e)(2) that the signature of the deponent:  
\_\_\_\_\_ was requested by the deponent or a party  
before the completion of the deposition and that the  
signature is to be before any notary public and returned  
within 30 days from date of receipt of the transcript.  
If returned, the attached Changes and Signature Page  
contains any changes and the reasons therefore:  
\_\_\_X\_\_\_ was not requested by the deponent or a  
party before the completion of the deposition.

I further certify that I am neither counsel  
for, related to, nor employed by any of the parties or  
attorneys in the action in which this proceeding was  
taken, and further that I am not financially or

MICHAEL J. LINDELL  
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1 otherwise interested in the outcome of the action.

2  
3 Certified to by me on this, the 13th day of June,  
4 2024.

5 *Edith A. Boggs*

6 Edith A. Boggs, CSR No. 3022  
7 Firm Registration No. 03  
8 Expiration Date: 7-31-2024  
9 1235 North Loop West, Suite 510  
10 Houston, Texas 77008  
11 Ph. No.: (713) 524-4600  
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1 COUNTY OF HARRIS )

2 STATE OF TEXAS )

3  
4 I hereby certify that the witness was notified  
5 on \_\_\_\_\_ that the witness has 30 days or  
6 (\_\_\_\_ days per agreement of counsel) after being  
7 notified by the officer that the transcript is available  
8 for review by the witness and if there are any changes  
9 in the form or substance to be made, then the witness  
10 shall sign a statement reciting such changes and the  
11 reasons given by the witness for making them;

12 That the witness' signature was/was not  
13 returned as of \_\_\_\_\_.

14 Subscribed and sworn to on this, the 13th day  
15 of June, 2024.

16  
17 *Edith A. Boggs*

18 \_\_\_\_\_  
19 Edith A. Boggs, CSR No. 3022  
20 Firm Registration No. 03  
21 Expiration Date: 7-31-2024  
22 1235 North Loop West, Suite 510  
23 Houston, Texas 77008  
24 Ph. No.: (713) 524-4600  
25